

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Zacharia A. Alarayshi, Laila K. Alarayshi,
Arab-American Anti-Discrimination
Committee o/b/o itself and its members,
Arab Civil Rights League o/b/o itself and
its members

Civil Action No. _____
Hon.

vs

United States Secretary of State, Anthony
Blinken in his official capacity
2201 C. Street N W
Washington, DC 20520

And

United States Secretary of Defense Lloyd
Austin in his official capacity
1000 Defense Pentagon RM 3E880
Washington, DC 20301-1000

/

**EMERGENCY COMPLAINT FOR MANDAMUS WITH REQUEST FOR
INJUNCTIVE RELIEF**

JURISDICTION AND VENUE

1. This case arises under the United States Constitution, 42 U.S.C. 1983, and the laws of the United States and presents a federal question within this Court's jurisdiction pursuant to the United States Constitution 28 U.S.C. 1331. This Court may also exercise jurisdiction under the Administrative Procedures Act, 5 U.S.C.

702-704. Finally this Court may also exercise jurisdiction under 28 U.S.C 1361 for mandamus jurisdiction over this action.

2. Venue is proper pursuant to 28 U.S.C. 1391 in the United States District Court for the Eastern District of Michigan where some individual Plaintiff's reside, where Plaintiff Arab Civil Rights League ("ACRL") is located (Dearborn, Michigan), and where the American-Arab Anti-Discrimination Committee ("ADC") regularly conducts business.

PLAINTIFFS

3. Plaintiffs Zakaria A. Alarayashi and Laila K. Alarayshi are United States Citizens of Palestinian ethnicity and residents of Dearborn, Michigan. They are currently trapped abroad in the Gaza Strip in an active war zone where they are under imminent threat of death or serious bodily injury. On information and belief they are not alone among U.S. Citizens also in grave danger. However, they have lost any effective means of communication with the outside world.

4. Plaintiff ACRL is a national civil rights organization organized pursuant to Section 501(c)3 of the Internal Revenue Code. It is based in Michigan. Among its members are Palestinian-Americans (U.S. citizens) trapped in Gaza and unable to communicate with the outside world.

5. ACRL and its members are harmed by the Defendant's inaction described below. ACRL members have experienced and will continue to suffer discrimination,

differential and disparate treatment as alleged below. Unless the relief requested is granted, ACRL and its members will continue to be adversely affected and irreparably harmed by the continued discriminatory and treatment that Defendants have authorized/failed to authorize as alleged below.

6. Plaintiff ADC is also a national civil rights organization organized pursuant to Section 501(C)3 of the Internal Revenue Code. It is based in Washington, D.C. and regularly conducts business in the Eastern District of Michigan. Among its members are Palestinian-Americans (U.S. citizens) trapped in Gaza and unable to communicate with the outside world.

7. ADC and its members are harmed by the Defendant's inaction described below. ADC members have experienced and will continue to suffer discrimination, differential and disparate treatment as alleged below. Unless the relief requested is granted, ADC and its members will continue to be adversely affected and irreparably harmed by the continued discriminatory and treatment that Defendants have authorized/failed to authorize as alleged below.

DEFENDANTS

8. Defendant Anthony Blinken ("Blinken") is the United States Secretary of State and, as the head of the United States Department of State ("State Department"), is the senior diplomatic officer of the United States. Blinken is responsible for providing consular and other services to United States Citizens traveling abroad as

well as decisions of the United States government for the evacuation of U.S. citizens abroad during times of crisis. In this case, there has been no Noncombatant Operations Order (“NEO Order”). This type of order is normally implemented during a crisis or war to evacuate U.S. Citizens and their families from abroad and to secure their return to the United States.

9. Defendant Lloyd Austin (“Austin”) is the United States Secretary of Defense and, next to the President of the United States responsible for civilian control of the United States Military and the U.S. Department of Defense (“Defense Department”). In his capacity he directs all branches of the military and is responsible for military strategy of the U.S. government. Austin is responsible for executing any NEO to evacuate U.S. Citizens and their families from areas under siege or war around the world in conjunction with co-Defendant Blinken.

EXHAUSTION OF REMEDIES

10. Plaintiffs have exhausted their remedies, as there are no remedies outside of judicial action where a federal constitutional violation is alleged. It is well-settled that exhaustion of remedies is not required if it would be futile. *See, e.g. American-Arab Anti-Discrimination Committee v. Reno* 10 F.3d 1045, 1058 (9th Cir. 1995); *see also Ruiz v. Mukasey*, 269 Fed. Appx. 616, 618 (9th Cir 2007). Furthermore, exhaustion of remedies is not required if there would be irreparable harm. *Richardson v. Reno*, F. Supp., 1998 WL 74229 * 3 (S.D. Fla. February 13, 1998);

Peralta Veras v. Ashcroft (E.D.N.Y. 2002). No action or any other request has been made in Federal or any other Court to review the Complaint herein.

PRELIMINARY STATEMENT AND FACTUAL BACKGROUND

11. Plaintiffs reallege the allegations in paragraphs 1-8 inclusive as if fully set forth herein.

12. This lawsuit challenges the constitutionality of the U.S. Government's actions/failure to act to protect United States citizens trapped in Gaza, Palestine, an active war zone. Their lives are in grave danger from ongoing military action and violence in which they are non-combatants. This lawsuit is by no means an attempt to interfere with the armed conflict in Israel and Palestine. This action seeks only to compel a governmental agenc(ies) to initiate evacuation efforts and secure the safety and well-being of its citizens.

13. U.S. Citizens, including those who are plaintiffs, are being subjected to trauma, both physical and mental, and many have witnessed fellow family members or relatives being killed or seriously injured in the ongoing conflict in the Gaza Strip.

14. The State Department has advised both ACRL and ADC that it would not engage in evacuation efforts, procedures, and or processes to safely evacuate United States citizens in Gaza. These statements, especially given the on-going bombardment of the area, constitute final agency action.

15. On October 11, 2023 the State Department declared that Gaza was unsafe and issued a travel advisory for U.S. citizens travelling there. Unfortunately, there were already U.S. citizens in Gaza who had no prior notice of or the ability to flee the violence.

16. There are far too many press reports to cite regarding the bombardment of civilian installations in Gaza and the inability of people to flee.

17. At the present moment, estimates of the civilian casualties in Gaza number in the thousands.

18. The Gaza Strip is surrounded by an ongoing naval blockade making escape by sea impossible. Borders to Egypt and Israel have been closed. Active fighting is ongoing and blocking routes from population centers to those border crossings.

19. U.S. Citizens have already been reported dead from aerial bombardment which is likely to precede a ground invasion by Israeli Defense Forces. Upon information and belief U.S. Citizens, Individual Plaintiffs, and members of the Plaintiff organizations will be subject to assault, attack, bombardment, dismemberment, and death if they attempt to escape through any route out of population centers.

20. According to press reports, Israeli Defense forces plan to intensify attacks on Gaza's population centers. Water, electricity, food and medical supplies have been

prevented from entering the affected area. Hospitals are closed, damaged and unable to intake more patients as they are over capacity.

21. The Prime Minister of Israel has made statements indicating that a massive attack is coming to the densely populated Gaza strip.¹

22. At least 12 other countries are engaged in active efforts to evacuate their citizens from the war zone:

Australia <https://www.reuters.com/world/australia-organise-flights-evacuate-citizens-israel-2023-10-11/>

Cyprus <https://www.barrons.com/news/cyprus-offers-transit-for-foreign-evacuees-from-israel-6d474bc1>

Denmark <https://www.firstpost.com/world/denmark-airforce-to-evacuate-citizens-from-israel-palestine-13234762.html>

Mexico <https://www.theyucatantimes.com/2023/10/mexico-evacuates-more-than-270-citizens-from-the-israeli-gaza-war/>

United Kingdom <https://www.bbc.com/news/uk-67091170>

Poland <https://notesfrompoland.com/2023/10/09/first-military-flights-evacuating-poles-from-israel-arrive-in-warsaw/>

Kazakhstan <https://astanatimes.com/2023/10/kazakh-nationals-return-home-from-israel/>

¹ <https://www.msn.com/en-us/news/world/watch-live-benjamin-netanyahu-provides-update-on-israel-war-after-hamas-threatens-executions/ar-AA1hW60E>

1:00 - “clear the villages”

1:12 – re “terrorists” – “working around the clock to eliminate them”

1:15 – “start a massive attack against the Hamas with forces has never seen before”

2:43 – “the images of Hamas, places in Gaza, is just the beginning. We have killed many terrorists and this is not going to stop. **Any place from where Hamas operates will turn into rubble.** This is already happening today, and it will continue happening even more so.”

Italy <https://www.aa.com.tr/en/middle-east/200-italian-citizens-stranded-in-israel-return-home/3014450#>

South Korea <https://www.reuters.com/world/asia-pacific/flight-carrying-south-koreans-tel-aviv-arrives-home-2023-10-10/>

Switzerland <https://www.swissinfo.ch/eng/business/third-swiss-repatriation-flight-from-israel-arrives-in-zurich/48886930>

Ukraine https://news.yahoo.com/first-200-ukrainians-evacuated-israel-144858098.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cub2ZmdGhlYmVhdGVucG9pbmRzLmNvbS8&guce_referrer_sig=AQAAAM1Nbg a94onFpmJ2Zf5Dkzofync07uGHTlvH59VMJyx3KXrCtg4EckWsZ8USQH GKyaWO1kMctS0POes6pabGGxisAcuy0jLN6MhyY-QSX5_5H0LE-2T2Fg_Jd6gHupOKN5Dg8VaejZNymy97eeUBkF2WHoPDqF7-ik5s01WKpCLF

Canada <https://www.reuters.com/world/americas/canada-planning-evacuate-canadians-israel-coming-days-foreign-minister-2023-10-10/>

23. The U.S. Government, while denying its citizens trapped in Gaza *any* evacuation services, has offered humanitarian flights to U.S. Citizens out of Israel: [U.S. offers flights for Americans seeking to leave Israel amid war - Los Angeles Times \(latimes.com\)](#)

24. A partial list of instances since 1975 of when the U.S. has mobilized the military and disaster relief agencies to evacuate U.S. Citizens from active war zones or from similar dangerous situations during times of war/armed hostilities:

- a. Vietnam, 1975
- b. Lebanon, 1976
- c. Iran, 1981
- d. Bosnia, 1992
- e. Kosovo, 1999

- f. Iraq War (Various, including during initial hostilities)
 - g. Libya, 2011
 - h. Egypt, 2011
 - i. Syria, 2014
 - j. Afghanistan, 2021
25. Between 2001 and 2006, the United States has conducted over 80 evacuations of U.S. citizens abroad. *See United States Government Accountability Office, GAO-07-893 U.S. Evacuations from Lebanon, at 3 (July 7, 2007).*
26. The U.S. has not evacuated a single citizen from Gaza since the commencement of hostilities on October 10, 2023 in spite of the active and ongoing inquiries of Plaintiffs ADC and ACRL about the well-being of their members.²

CLAIMS FOR RELIEF

COUNT I: DENIAL OF EQUAL PROTECTION

(14th Amendment and 42 U.S.C 1983)

27. Plaintiffs reassert paragraphs 1-26 inclusive as if fully set forth herein.
28. Plaintiffs Zakaria A. Alarayashi and Laila K. Alarayshi are members of the protected class of Palestinian Americans.

² See Ex 1 Sworn Statements of Mariam Charara and Yahya Alararayashi and Correspondence dated October 12, 2023 from Mariam Charara to U.S. Senator Debbie Stabenow.

29. The members of ACRL and ADC who find themselves in the Gaza war zone are also members of the same protected class.

30. They are similarly situated to other U.S. Citizens that have received evacuation services from the very same war zone in which they now find themselves trapped and with no means of escape.

31. They are also similarly situated to U.S. Citizens who, on numerous previous occasions listed above, were evacuated from other war zones and places of other similar human catastrophes.

32. The disparate treatment set forth above has impermissibly infringed upon the exercise of their fundamental rights to life, liberty and the pursuit of happiness protected by the United States Constitution.

33. The disparate treatment set forth above was not necessary to serve the only compelling governmental interest at stake here which is to protect the safety and well-being of its citizens.

34. Defendants Blinken and Austin are state actors acting under color of law in the performance of their official duties.

**COUNT II: DEFENSE AND STATE DEPARTMENTS' VIOLATION OF
THE ADMINISTRATIVE PROCEDURES ACT, 5 U.S.C. 706(2)(A) ("APA")
ARBITRARY AND CAPRICIOUS ACTION**

35. Plaintiffs incorporate and reallege paragraphs 1-34 inclusive as if fully set forth herein.

36. Pursuant to the APA, Plaintiffs are entitled to judicial review from this Court of the State Department's refusal to coordinate evacuation efforts, processes, and/or procedures of U.S. citizens from Gaza. Plaintiffs have suffered a legal wrong because of agency action, or have been adversely affected or aggrieved by agency inaction.

37. Pursuant to the APA 5 U.S.C. 704, Plaintiffs are entitled to judicial review by this Court the Department of State's final agency action to not evacuate United States citizens from Gaza because Plaintiffs have no other adequate remedy at law.

38. Defendants are in violation of the APA, 5 U.S.C. 706 because Defendants unlawfully withheld and/or unreasonably delayed agency action to which Plaintiffs are entitled, the Defendants have taken action to which the Plaintiffs are entitled, the Defendants have taken action that is arbitrary and capricious and an abuse of discretion and not in accordance with law, and the Defendants have failed to provide through direct military assistance or contracting with commercial entities the necessary equipment, ships, airplanes, and other items that are available to Defendants to insure the security, safety, and well-being of U.S. citizens.

39. As a result of Defendants' violations of the APA, the Plaintiffs have been deprived of a swift, accommodating, and reasonable evacuation from Gaza,

Palestine. Plaintiffs continue to suffer mental and physical trauma and hardship that is a result of waiting for the Defendants to protect them and evacuate them safely.

COUNT III
(INJUNCTIVE RELIEF)

40. Plaintiffs incorporate and reallege paragraphs 1-39 inclusive as if fully set forth herein.

41. The State Department's highest priority is to protect U.S. citizens abroad in foreign nations.

42. The State Department failed to protect U.S. citizen Plaintiffs when it failed and or refused to include them in its existing plans to evacuate other classes from the same war region.

43. The State Department failed to provide adequate notice to travelling U.S. citizens so that they could have left in advance of the escalation of hostilities.

44. The State Department and Defense Department provided NO substantive means for Plaintiff U.S. citizens to leave the war zone or even communicate about their well-being.

45. Thousands of similarly-situated Americans remain in the direct line of fire of a heavily armed force with the stated purpose of attacking combatants whether or not they are located in proximity to civilian American citizens.

46. Defendants' inaction in failing to evacuate U.S. Citizens is the very definition of arbitrary and capricious, especially in light of their previous efforts under similar circumstances to keep travelling U.S. Citizens out of harm's way.

47. Absent an order from this Court compelling the Defendants to act and perform their sworn duties, their lives will remain in great peril.

48. That unless immediately restrained by this Court from their refusal to act, the Defendants' failure to protect U.S. citizens where it has the ability to do so, Plaintiffs will suffer great and irreparable harm, including the loss of life. Plaintiff has no adequate remedy at law and seek this Court's protection.

IRREPARABLE HARM

The Defendants' conduct is causing irreparable harm and injury to vulnerable U.S. citizens who are now under constant bombardment by modern weapons of war that do not discriminate between civilians and combatants. There is no realistic means for United States Citizens to safely leave Gaza, Palestine without the Defendants' support and assistance.

WHEREFORE, Plaintiffs request that injunctive relief be granted and judgment entered in favor of Plaintiffs and against Defendants that"

1. The Defendants use all resources at their disposal that are necessary and available, including but not limited to deployment of military ships, vessels and airplanes and/or contracting with private commercial ship liners and

airline carriers to evacuate U.S. citizens from Gaza and return them safely to the United States or another nation outside of the warzone in the most expeditious manner available; and

2. Declare the Defendants' inaction in failing to evacuate U.S. citizens from Gaza as arbitrary and capricious and violative of the statutory and constitutional provisions set forth herein.

Respectfully submitted,

SCHENK & BRUETSCH, PLC

By: /s/ JAMES P. ALLEN, SR.

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Attorneys for Plaintiffs

October 13, 2023

EXHIBIT 1

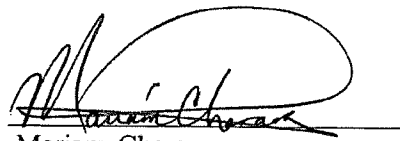
SWORN STATEMENT OF MARIAM CHARARA

Mariam Charara states:

- 1) I am the Executive Director of the Arab-American Civil Rights League ("ACRL") and received a request from Yahya Alarayshi on behalf of his parents Zakaria A. Alarayshi and Laila K. Alarayshi who are trapped in the hellish warzone of Gaza.
- 2) I have been actively reaching out to various government officials and agencies for assistance in trying to evacuate the trapped husband and wife.
- 3) I have reached out to Congresswoman Rashida Tlaib (currently in close collaboration with her and her staff), Senator Debbie Dingell, Senator Debbie Stabenow, Senator Gary Peters (currently in close collaboration with his staff). The last response for Senator Peters' Senior Constituent Services Representative was that they were awaiting feedback from the State Department on the Alarayshi family's behalf.
- 4) I would like to highlight the invaluable assistance and dedication of Congresswoman Rashida Tlaib throughout this challenging ordeal. Congresswoman Tlaib has been instrumental in our efforts to assist the Alarayshi family. Her office has maintained constant communication with both the family in Gaza and our organization, the Arab American Civil Rights League (ACRL). Congresswoman Tlaib's support has played a pivotal role in ensuring that the family's dire circumstances remain in the forefront of government attention.
- 5) The ACRL has been in regular contact with the State Department's Consular Affairs division, diligently reaching out every day and investing countless hours. Regrettably, responses received were consistently limited to advising the family to fill out the crisis form, with no information provided regarding evacuation. Additionally, they suggested contacting the U.S. Embassy in Jerusalem.
- 6) ACRL has also made numerous phone calls and exchanged communications with the U.S. Embassy in Jerusalem, seeking updates on the evacuation status. Verbal updates from the Embassy indicated that they had not yet been provided with evacuation information. Additionally, an email was sent to the U.S. Embassy in Israel, addressing the ambassador, and a response was received via email that stated only:

"U.S. citizens in Gaza are encouraged to leave as soon as possible. Given the dynamic security situation in Gaza, U.S. citizens should assess their own security when deciding whether to travel. U.S. government personnel are not able to travel to Gaza or the Gaza periphery to assist at this time. The U.S. Embassies in Jerusalem and Cairo are working to determine departure options for U.S. citizens in Gaza. You are already registered in our crisis tracking system, and we will continue to update you of options when we learn of them. U.S. officials stand ready to provide consular assistance to U.S. citizens departing Gaza upon arrival in Cairo. At this time, if you exit Gaza via the Rafah border crossing into Egypt, you should plan to find your own transportation to Cairo (5+ hour drive) or your final destination."

- 7) I have been in constant contact with Mr. Zakaria from Gaza since Tuesday, Yesterday he sent a voice message urgently requesting an update and reported, "they just hit the house next to us. We are scared. We can't go to the bathroom; we can't go anywhere. We don't have electricity, we're without water, there's nothing. I think we are going to die before we leave."
- 8) The ACRL has raised awareness as much as we possibly can through our reach by conducting media interviews and through other communication channels to draw attention to the urgency of the situation and garner the support of the broader community.
- 9) These efforts collectively demonstrate ACRL's dedication and persistence in seeking assistance and information to ensure the safety and evacuation of the Alarayschi family, American citizens trapped in Gaza.
- 10) Executed in Dearborn, Michigan, October 13, 2023. I declare under penalty of perjury that the foregoing is true and correct.



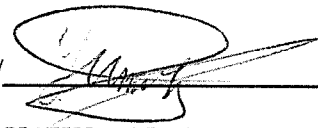
Mariam Charara

SWORN STATEMENT OF YAHYA ALARAYSHI

Yahya Alarayshi states:

- 1) I am the son of Zakaria A. Alarayshi and Laila K. Alarayshi, husband and wife, American citizens that are currently in desperate need of assistance to safely return to the United States after they became trapped in Gaza while visiting. They were peaceful tourists, on vacation and are now caught in a hellish warzone.
- 2) Our family has taken every possible step to safeguard their return and have sought assistance from every possible source. We are now at the mercy of this Honorable Court.
- 3) We have sought the assistance of the American Embassy in Israel who told my parents that they should make their way to the Egyptian border, which while a thirty minutes' drive, the road to the Egyptian border has become fraught with danger stemming from reports of incidence of gunfire by Israeli forces.
- 4) My father has relayed to me that the danger is surrounding them from all directions.
- 5) We have sought the assistance of the Arab-American Civil Rights League, who has attempted to petition legislators to have the State Department of the United States intervene to negotiate a brief ceasefire while American citizens are evacuated.
- 6) While trying to determine a solution to their predicament, the Rafah Crossing, which was where the US Embassy routed them reportedly closed, further exacerbating their predicament.
- 7) We have reached out to legislators ourselves and have gone on the media to plead for help.

- 8) Israeli Defense Forces sent a message to evacuate Gaza and head south to the valley, however, reports indicate those heading south were bombed and killed. As such fear is spreading widely, and no one knows what to do.
- 9) Executed in Dearborn, Michigan, October 13, 2023. I declare under penalty of perjury that the foregoing is true and correct.

/s/ 
YAHYA ALARAYSHI



October 12, 2023

ACRL is Non-profit,
501(c) 3 organizationVIA Electronic Mail
Senator Debbie Stabenow

Re: Urgent Assistance Needed for U.S. Citizens Stuck in Gaza

Dear Senator Stabenow,

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Mariam E. Charara**P. 313.633.0231
F. 313.633.1976
info@acrlmich.****19855 Outer Drive, Suite
202 Dearborn MI 48124**

I hope this message finds you well. I am writing to you on behalf of the Arab American Civil Rights League (ACRL) to bring to your attention a pressing matter involving a United States citizen and Michigan resident, Zakaria A. Alarayshi (U.S. passport number: 561427734) and his wife Laila K. Alarayshi (Gaza passport ID number: 930987045 and USCIS # 061-368-972). They are currently in dire need of assistance to safely return to the United States due to their unfortunate predicament in Gaza.

As an organization dedicated to safeguarding civil rights and ensuring the safety and well-being of all individuals, including U.S. citizens, the ACRL places great importance on the urgent situation that Mr. and Mrs. Alarayshi find themselves in. They were visiting Gaza when they became unintentionally caught up in the ongoing conflict, and their safety is now at risk.

The Alarayshi family has taken every possible step to seek assistance. They reached out to the American Embassy in Israel, which advised them to make their way to the Egyptian Border. However, their journey to the border, which is only 30 minutes away from their home, has become dangerous due to the conditions on the road, with reports of incidents involving gunfire by Israeli forces.

I have personally spoken directly with Zakaria Alarayshi, who provided the following statement: "We are trapped in Gaza amidst the ongoing conflict, unable to leave. I was originally at my own home, but due to the increasing threat and chaos in my neighborhood, I had to seek refuge with others who were also in search of safety. Unfortunately, I am now in a dangerous situation with danger surrounding me from all directions. What was meant to be a peaceful vacation has turned into an unexpected ordeal as I'm caught up in this conflict right under the warzone."

We are kindly requesting your support and intervention to prioritize this case. In collaboration with the Alarayshi family, we implore you to explore all available avenues to ensure their safe return to the United States. Given the gravity of the situation, it may be necessary to contact the State Department to facilitate a brief ceasefire that would allow American citizens to evacuate and reach the border safely.

The response from the U.S. Embassy recommending that they check the status of the Rafah Crossing into Egypt is appreciated, but the safety concerns raised by the Alarayshi family make this route currently unviable.

ACRL is Non-profit,
501(c) 3 organization



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Mariam E. Charara

Additionally, Mr. Alaraysi has informed us that while the embassy advised him to wait for his appointment, the scheduled appointment is significantly delayed, and he has expressed concerns that the Rafah Crossing, which was initially suggested as an alternative, has reportedly closed, further exacerbating their predicament.

As a civil rights organization deeply committed to upholding the principles of justice, equality, and safety for all, the ACRL believes that no individual, regardless of their background or circumstances, should endure such hardship. We hope you can join us in advocating for the safe return of Zakaria and Laila Alaraysi to the United States.

Thank you for your attention to this urgent matter. We kindly request your action on behalf of the American people and the values that define our nation.

Sincerely,

Nabih Ayad
Founder

James P. Allen

James P. Allen
Chairman

Mariam E. Charara

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